

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

ETHICON WAVE 11 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
CHRISTINA PRAMUDJI, M.D. FOR WAVE 11**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Christina Pramudji for Ethicon Wave 1, Dkt. 2035 (motion), Dkt. 2037 (memorandum in support), Dkt. 2236 (reply). Plaintiffs respectfully request that the Court exclude Christina Pramudji's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 11 cases identified in Exhibit A attached hereto.

Dated: August 7, 2019

Respectfully submitted,

/s/ D. Renee Baggett \_\_\_\_\_  
Renee Baggett, Esq.  
Bryan F. Aylstock, Esq.  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 East Main Street, Suite 200  
Pensacola, Florida 32563  
(850) 202-1010  
(850) 916-7449 (fax)  
E-mail: [baylstock@awkolaw.com](mailto:baylstock@awkolaw.com)

/s/ Thomas P. Cartmell  
THOMAS P. CARTMELL  
Wagstaff & Cartmell LLP  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
816-701-1102  
Fax 816-531-2372  
tcartmell@wcllp.com

## EXHIBIT A

Albarado, Mona & Jules	2:18-cv-00949
Anthony, Deanna	2:12-cv-06831
Cisneros, Alicia & Heriberto	2:18-cv-00289
Cox, Blake	2:12-cv-06096
Garvin, Janna & Michael David	2:13-cv-19899
Geery, Michelle A.	2:14-cv-09072
Gordon, Rosemary	2:14-cv-16417
Howard, Jamie Michelle	2:14-cv-07903
Kress, Eileen	2:14-cv-19292
Lynch, Pamela	2:13-cv-27345
Martin, Kayleen	2:13-cv-18148
Mason, Lisa	2:13-cv-07175
Meindertsma, Jeanne & Bruce	2:13-cv-23903
Morris, Michelle Lee & Scottie J.	2:13-cv-13594
Robinson, Maria	2:13-cv-07186
Russell, Mellissia & Greg	2:16-cv-02730
Shilson, Karren A.	2:13-cv-09236
Smith, Barbara	2:12-cv-04791
Sotolongo, Yolanda Rey	2:18-cv-00242

**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett \_\_\_\_\_  
D. Renee Baggett  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)